

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Implementation of the Child Safe Viewing Act;)	MD Docket No. 09-26
Examination of Parental Control Technologies)	
For Video or Audio Programming)	

**COMMENTS OF
SPRINT NEXTEL CORPORATION**

Sprint Nextel Corporation (“Sprint”) submits these comments in response to the Notice of Inquiry (“NOI”) that the Commission has commenced pursuant to the Child Safe Viewing Act (the “Act”).¹

I. THE PARENTAL CONTROL FEATURES CURRENTLY PROVIDED BY SPRINT ARE AVAILABLE WITHOUT CHARGE AND ARE EASY FOR PARENTS TO FIND AND USE

Sprint remains committed to providing its customers the products and features they need and desire. Among the many features being demanded in the marketplace today are controls that permit parents to manage the wireless experience of their children. Responding to this demand, Sprint has developed numerous ways for parents to ensure that their children have a positive wireless experience, and provides most of these features free of charge. Indeed, the wireless industry as a whole anticipated this demand even before many of the current advanced features of today’s wireless phones became popular. More than three years ago, the wireless industry developed content guidelines and Internet access guidelines to provide the basis for such parental

¹ *Implementation of the Child Safe Viewing Act; Examination of Parental Control Technologies for Video and Audio Programming*, MB Docket No. 09-26, *Notice of Inquiry*, FCC 09-14 (March 2, 2009) (“NOI”); Child Safe Viewing Act of 2007, Pub. Law No. 110-452, 122 Stat. 5025 (Dec. 2, 2008)(the “Act”).

controls.² Since that time, carriers have developed a wide range of blocking technologies and parental control features without any regulatory mandate. As an intensely competitive industry, wireless carriers have a strong incentive to meet the needs of consumers.

Sprint provides an increasing array of parental controls that its customers can access for free. These free features include:

- Wireless Web Access, which permits parents to restrict Internet access so children and teens can reach only designed websites deemed appropriate for minors (17 and under).
- Text Blocking, which enables parents either to disable text messaging entirely or to block unwanted incoming text messages by adding selected telephone numbers of the “block numbers” portion of the parent’s account.
- Data Blocking, which enables parents to disable any data usage on the child’s phone.
- Content Purchase Blocking, which enables parents to prevent children from buying and downloading content, such as games, ringers and screen savers.
- Voice Call Blocking, which enables parents to restrict incoming or outgoing voice calls to pre-approved phone book contacts.
- Camera Blocking, which permits a parent to prohibit use of the camera or other video functions available on the phone.³

In addition, Sprint provides (for \$5/monthly per family) a Family Locator service that allows parents to track the location of their children by using GPS chips in their child’s phone.⁴

Sprint also believes that its parental controls are easy for parents to find, use, and activate.⁵ For instance, parents can activate the Wireless Web Access feature in one of three ways:

1. From their handset (by selecting “My Account” and then selecting “Wireless Web Access”);

² See *id.* at ¶ 29 (describing the wireless Carrier Content Classification and Internet Access Control Guidelines).

³ See generally http://www.nextel.com/en/services/safety_security/parental_control.shtml

⁴ See generally http://www.nextel.com/en/services/gps/family_locator.shtml.

⁵ See NOI at ¶ 31.

2. From any Internet-connected computer (by going to www.sprint.com, logging in his or her account and then selecting Settings & Passwords, and under Accounts Tools, selecting Wireless Web Access; or
3. By calling Customer Care (at 888-211-4727).

Once the customer reaches the Wireless Web Access page (for options 1 and 2 above), the customer will select the appropriate phone number(s) within the account and simply provide requested information.

The Commission also seeks comment on “other technologies currently in development for use on wireless devices.”⁶ Sprint does have additional parental control features under development that it intends to offer parents in the future. But as the Commission will appreciate, given the intense competition within the wireless industry, Sprint cannot disclose its competitive offerings prior to launch.

II. SPRINT UNDERSTANDS THE IMPORTANCE OF EDUCATION, AS EVIDENCED BY ITS 4NETSAFETYsm PROGRAM

The experience with the V-chip confirms that blocking technologies are useless if consumers either do not know that their devices contain such features or if they find the blocking features too complicated to use.⁷ Sprint believes, as discussed above, its parental control features are easy to use. In addition, Sprint is committed to educating its customers about its parental controls, including describing on its website the blocking features that it offers.⁸

Sprint’s commitment to education is further confirmed by its launch in 2007 of the 4NetSafetysm program, in partnership with the National Center for Missing & Exploited Children (“NCMEC”) and the National Education Association Health Information Network (“NEA

⁶ See NOI at ¶ 32.

⁷ As the FCC has correctly noted, Congress enacted the Act because it was “concerned about the V-chip which is a parental empowerment tool already in the market, and about the low-level of V-chip use.” NOI at ¶ 10. See also *id.* at ¶ 7.

⁸ See http://www.nextel.com/en/services/safety_security/parental_control.shtml

HIN"). The 4NetSafety program (www.sprint.com/4netsafety) is designed to open the lines of communications about Internet safety between young people and the adults who care for them. 4NetSafety offers free tools from expert resources to address the perils that young people commonly encounter online and encourage a positive dialogue about Internet safety. More specifically, the 4NetSafety program is designed to:

- Help teens understand the impact of the decisions they make online and the potential dangers they face;
- Educate parents and guardians about the online habits of young people and the free resources available from expert sources to encourage positive dialogue about Internet safety; and
- Help educators and law enforcement implement Internet safety education, and keep parents informed of potential problems.

Importantly, 4NetSafety resources also are available in Spanish, so they can be accessed by the Hispanic community.

The 4NetSafety resources available to teens to address Internet safety through comic book-style characters who model safer online practices are designed to appeal to pre-teens and young teens. This content, known as NSTeens, was created by Internet safety experts at NCMEC's NetSmartz[®] Workshop.

4NetSafety resources for adults include safety tips, suggested activities, and discussion ideas that accompany the teen resources. Adults also have free access to the bNetS@vvy, an online resource created by the NEA HIN that offers adults a vast array of information to help teach pre-teens, in particular, how to navigate the Internet safely. The website includes articles written by teens, parents, educators, and Internet safety experts along with a blog and lesson plans for educators. All of these 4NetSafety resources can be accessed by visiting www.4NetSafety.com.

Last summer, former FCC Commissioner Tate said of the 4NetSafety program:

As wireless overtakes wireline for communicating – especially for our children – it is critical that we all take responsibility to protect them online. That is why I know parents will be pleased with Sprint Nextel's 4NetSafety Program, a partnership with National Center for Missing and Exploited Children and the NEA Health Information Network, which demonstrates their leadership on internet safety. I continue to challenge the entire industry – across all platforms – to develop creative solutions and tools that reduce the risks our children face online, from cyberbullying to predators, and provide a safer, healthier experience.⁹

The 4NetSafety program is supported through funds raised by Sprint Project Connectsm, Sprint's wireless phone recycling program. Sprint has committed \$3 million over three years (2007-2009) to Internet safety through the 4NetSafety program.

III. CONCLUSION

Sprint looks forward to the report the Commission will prepare later this year, and Sprint stands ready to assist the Commission in this important endeavor.

Respectfully submitted,

SPRINT NEXTEL CORPORATION

/s/ Charles W. McKee

Charles W. McKee
Director, Government Affairs

Sprint Nextel Corporation
2001 Edmund Halley Drive
Reston, VA 20191
703-433-3786

Scott R. Freiermuth
Counsel, Government Affairs
6450 Sprint Parkway
Overland Park, KS 66251
913-315-8521

April 16, 2009

⁹ FCC NEWS, Statement of Commissioner Deborah Taylor Tate on Sprint Nextel's 4NetSafety Program Which Uses Proceeds from Phone Recycling to Teach Kids About Internet Safety (Aug. 12, 2008).